



Curtis L. Groves
Associate General Counsel
Federal Regulatory and Legal Affairs

1300 I Street, NW, Suite 500 East
Washington, DC 20005
Phone 202.515.2179
Fax 202.336.7922
curtis.groves@verizon.com

February 13, 2018

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Rural Call Completion, WC Docket No. 13-39

Dear Ms. Dortch:

On February 12, 2018, Fred Moacdieh, Tim Vogel, and I of Verizon met with Daniel Kahn, D'wana Terry, Melissa Kinkel (by phone), Adam Copeland, Matthew Collins, E. Alex Espinosa, and Zach Ross to discuss the Commission's rural call completion proceeding.

Consistent with our comments,¹ we explained the Commission should eliminate the current data recording, retention, and reporting regime and adopt instead its proposed new rule requiring covered providers to monitor intermediate providers' performance and hold them accountable. Allowing covered providers flexibility to implement this rule would allow the Commission to achieve its goal of establishing a more effective and less burdensome regime to address rural call completion. By contrast, we explained, new data requirements would be costly to implement and likely would be ineffective.

We also expressed interest in working with the Commission to implement the *Improving Rural Call Quality and Reliability Act of 2017*, which now has passed both houses of Congress.

Very truly yours,

Copies:	Daniel Kahn	D'wana Terry
	Melissa Kinkel	Adam Copeland
	Matthew Collins	E. Alex Espinosa
	Zach Ross	

¹ See Comments of Verizon (Aug. 28, 2017); Reply Comments of Verizon (Sept. 25, 2017).